

Greetings - I am writing to comment on the newly proposed enforcement of FCC fax regulations that affect professional associations. Removing the "established business relationship" qualification from the fax regulations is absolutely bad for business, forcing associations like us, and other companies, to obtain the written consent of our own members, clients and industry partners before transmitting any fax that could be interpreted as commercial in nature. Our members desire and expect communications from us that relate to association events and publications. The cost for this two-person staff to maintain fax permission slips is onerous and, frankly, ridiculous. The association community has already raised numerous concerns about the new regulations that remain a subject of speculation, including exactly which transmissions the FCC would interpret as commercial in nature, whether written consent to a national association would extend to chapter or affiliate faxes, and whether a written consent form would expire with membership, for example. These are not small issues for a professional state-level association like us. Your reconsideration of this enforcement is encouraged.

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